

STATE OF	*	IN THE
MARYLAND	*	CIRCUIT COURT
V.	*	FOR
DARRELL A. MILLER	*	ANNE ARUNDEL
	*	COUNTY

INDICTMENT

The Grand Jurors of the State of Maryland for the body of Anne Arundel County do on their oath present that

COUNT I

DARRELL A. MILLER

between the 17th day of September, 2010 and the 15th day of November, 2010, at Anne Arundel County aforesaid, did steal money of a value of at least **ONE THOUSAND DOLLARS (\$1,000.00)**, but less than TEN THOUSAND DOLLARS (\$10,000.00), property of the campaign finance entity "Friends of Darrell A. Miller", to wit: being then and there the duly appointed Chairman of the campaign finance entity "Friends of Darrell A. Miller", and having both signature authority over the bank account of that entity and possession of a debit card in the name of "Friends of Darrell A. Miller", did willfully and knowingly exert unauthorized control over the funds of "Friends of Darrell A. Miller" by withdrawing funds from and incurring charges against that account for his personal use and benefit in violation of § 7-104 of the *Criminal Law Article*, Annotated Code of Maryland and against the peace, government and dignity of the State.

(Theft over \$1,000.00, *Criminal Law Article*, § 7-104)

COUNT II

And the jurors aforesaid upon their oath aforesaid do further present that the said

DARRELL A. MILLER

between the 17th day of September, 2010 and the 15th day of November, 2010, at Anne Arundel County aforesaid, being then and there the duly appointed Chairman of the campaign finance entity "Friends of Darrell A. Miller", a responsible officer of said committee charged with the fiduciary duty to ensure that expenditures of the committee were made only for campaign purposes, in violation of said fiduciary duty, did fraudulently and willfully appropriate money in an amount exceeding \$1,000.00, held by him in a fiduciary capacity for the benefit of "Friends of Darrell A. Miller" to his personal use and benefit, contrary to the trust reposed in him, in violation of § 7-113 of the *Criminal Law Article*, Annotated Code of Maryland and against the peace, government and dignity of the State.

(Misappropriation by a Fiduciary, *Criminal Law Article*, § 7-113)

COUNT III

And the jurors aforesaid upon their oath aforesaid do further present that the said

DARRELL A. MILLER

between the 17th day of September, 2010 and the 15th day of November, 2010, at Anne Arundel County aforesaid, being then and there the duly appointed Chairman of the campaign finance entity ““Friends of Darrell A. Miller””, and having both signature authority over the bank account of that entity and possession of a debit card in the name of “Friends of Darrell A. Miller”, did willfully and knowingly disburse funds of ““Friends of Darrell A. Miller”” by withdrawing funds from and incurring charges against that account that were not in accordance with the purposes of the campaign finance entity ““Friends of Darrell A. Miller”, to wit, did disburse funds of said entity to pay personal expenses of the said **DARRELL A. MILLER** and not for campaign purposes in violation of § 13-218(b)(ii) of the *Criminal Law Article*, Annotated Code of Maryland and against the peace, government and dignity of the State.
(Unlawful Disbursement, *Election Law Article* § 13-218(b)(ii))

COUNT IV

And the jurors aforesaid upon their oath aforesaid do further present that the said

DARRELL A. MILLER

between the 1st day of July, 2010 and the 15th day of November, 2010, at Anne Arundel County aforesaid, being then and there the duly appointed Chairman of the campaign finance entity known as “Friends of Darrell A. Miller”, did knowingly and willfully make disbursements from the designated campaign fund account of “Friends of Darrell A. Miller” other than by check drawn on said account in violation of § 13-220 of the *Election Law Article* of the Annotated Code of Maryland and against the peace, government and dignity of the State.

(Improper Disbursement, *Election Law Article*, § 13-220)

COUNT V

And the jurors aforesaid upon their oath aforesaid do further present that the said

DARRELL A. MILLER

between the 1st day of July, 2010 and the 15th day of November, 2010, at Anne Arundel County aforesaid, being then and there both the duly appointed Chairman of the campaign finance entity "Friends of Darrell A. Miller" and the candidate authorizing that campaign finance entity, did knowingly and willfully make disbursements for the campaign finance entity known as "Friends of Darrell A. Miller" in violation of §13-218(d)(3) of the *Election Law Article* of the Annotated Code of Maryland, and against the peace, government and dignity of the State.

(Improper Disbursement by Chairperson, *Election Law Article*, § 13-218(d)(3))

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